



Honorable Gary Spraker
United States Bankruptcy Judge



Entered on Docket
July 28, 2022

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Attorneys for Christina W. Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re
DOUBLE JUMP, INC.
Debtor.

Lead Case No.: BK-19-50102-gs
(Chapter 7)
Substantively Consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

CHRISTINA W. LOVATO,
Plaintiff,
v.
KING SOLARMAN, INC., et al.,
Defendants.

Adversary No.: 21-05028-gs

**AGREED ORDER ESTABLISHING
DISCOVERY PLAN AND SCHEDULING
ORDER**

Hearing Date: N/A
Hearing Time:

The Court having reviewed the pleadings on file, having been apprised of the agreement between Plaintiff, Christina W. Lovato, chapter 7 trustee ("***Plaintiff***") and Defendants, King Solarman, Inc. and Chiang Lian Cung a/k/a Michael Cung (together, "***Defendants***"), having considered the presentations of counsel at the June 9, 2022 Status Conference, and for good cause appearing,

IT IS ORDERED that the Court adopts the Scheduling Order, as follows:

1. Pre-Discovery Disclosures. The parties have already made initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1).
2. Discovery Plan. The parties jointly propose to the court the following discovery plan:
 - a. Discovery will be needed on all matters within the scope of F.R.C.P. 26(b).
 - b. Fact discovery commenced in time to be completed by February 28, 2023.
 - c. Supplementations under Rule 26(e) due March 20, 2023.
 - d. All discovery shall be governed by the Federal Rules of Civil Procedure, as made applicable by the Federal Rules of Bankruptcy Procedure.
 - e. Disclosure of expert testimony under Rule 26(a) due from Plaintiff and from Defendants by March 27, 2023.
 - f. Expert discovery commenced in time to be completed by May 1, 2023.
3. Other Items.
 - a. Plaintiff will be allowed until January 4, 2023 to join additional parties and until January 4, 2023 to amend the pleadings.

- b. Defendants will be allowed until January 4, 2023 to join additional parties and until January 4, 2023 to amend the pleadings.
- c. The parties shall mediate by April 3, 2023.
- d. All potentially dispositive motions must be filed by May 18, 2023.
- e. The parties request a pretrial conference in June 2023.
- f. Final lists of witnesses and exhibits under Rule 26(a)(3) will be due from Plaintiff and from Defendants seven days prior to the pretrial conference.
- g. Parties shall have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- h. The case should be ready for trial by July 1, 2023 and at this time, the trial is expected to take approximately three days.
- i. The parties do not request a conference with the Court before entry of this Order.
- j. The parties request a status conference on August 11, 2022 and will endeavor to schedule a status conference every 45 days thereafter.
- k. This Order supersedes any prior scheduling order entered in this Adversary Proceeding.
- l. The Parties shall meet and confer if any other orders, statements, or directives issued by the Court alter, affect, or relate to this Order.
- m. All deadlines in this order are agreed to and entered subject to a motion to modify such deadlines under the Federal Rules of Civil Procedure.

Respectfully submitted by:

HARTMAN & HARTMAN

/s/ Jeffrey L. Hartman

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MELAND BUDWICK, P.A.

/s/ Meaghan E. Murphy

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Kathryn S. Diemer, Esq., Attorney for Defendants